### TSD File Inventory Index

Date: Mey 9, 2002 Initial: M Greens

Facility Name: Aleweste Tark Clean	39/;	her (On folder) site)	
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.1 Correspondence	*	.2 All Other Permitting Documents (Not Part of the ARA)	
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.6 CMI Correspondence	.9 Environmental Justice

Note: Trans	mittal Letter to Be	Included with Rep	ports.	individual	Lat but	ne e a l	a deula :
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## **SEPA**

# Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

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ID - For Official Use Only



June 28, 1989

Hazardous Waste Division Michigan Department of Natural Resources P. O. Box 30028 Lansing, MI 48909

Re: Subsequent Notification of Hazardous Waste Activity

Dear Sirs:

On June 19, 1989, Action Tank Wash, Inc. was acquired by Allwaste Tank Cleaning, Inc. As a result, Allwaste is notifying the Michigan DNR pursuant to the requirements set forth in 40CFR.

If there are any questions on this matter, please feel free to contact me at (404) 399-0777.

Sincerely,

Christopher L. Leppo

Environmental Coordinator

CLL/jpb

RECEIVED

JUL 3 1989

Waste Management Division



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Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

A. FIRST NOTIFICATION

Please go to the reverse of this form and provide the requested information.

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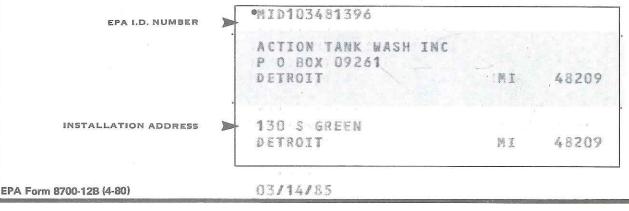
EPA Form 8700-12 (6-80) REVERSE

.D. - FOR OFFICIAL USE ONLY



#### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.





### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

attn: Wayne Welsh Allwaste Tank Cleaning INC Two Ravinia De STE 810 Atlanta Ga 30346

8-29-89

130 Green ST Detroit Mi 48209

	RE: EPA ID #: MID 103 48 139 C
	In response to your request of the following information
	has been updated:
) ~)	installation name and ownership-Allwaste Tank Cleaning Inc. waste codes per your notification
<u>Z</u> 1	waste Codes per your normation
چ ک	installation contact-Wayne Welsh (313) 842-0220
4) -)	installation contact-Wayne Welsh (313) 842-0220 installation mailing address as above installation listed as a generator
کی	Installation listed as a generator
	If you have any questions, please contact Sharon Kiddon at (312)886-6173.

Arthur S. Kawatachi Information Section

Office of RCRA

Sincerely yours,

cc: State Agency
File

United States Environmental Protection Agency Washington, DC 20460

## Notification of Hazardous Waste Activity

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

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June 28, 1989

RCRA Activities
US EPA Region V
Waste Management Division
P. O. Box A3587
Chicago, IL 60690

Re: Subsequent Notification of Hazardous Waste Activity

Dear Sirs:

On June 19, 1989, Action Tank Wash, Inc. was acquired by Allwaste Tank Cleaning, Inc. As a result, Allwaste is notifying the EPA pursuant to the requirements set forth in 40CFR.

If there are any questions on this matter, please feel free to contact me at (404) 399-0777.

Sincerely,

Christopher L. Leppo

Environmental Coordinator

Christopher V. Vygoo

CLL/jpb



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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARLENE J. FLUHARTY STEPHEN V. MONSMA EWART MYERS D. D. OLSON HAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

Gordon E. Guyer, Director S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

October 30, 1986

Mr. Dean Perakis, Owner Action Tank Wash, Inc. 130 S. Green Detroit, MI 48209

RE: MID 103481396

Dear Mr. Perakis:

This letter is to acknowledge receipt of Mr. Seydou Diop's Tetter dated October 24, 1986 indicating your compliance program for RCRA deficiencies cited during my inspection on May 20, 1986. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please contact me at 313-459-9180.

Sincerely,

Larry AuBuchon

Hazardous Waste Division

LA/bs

cc: U.S. EPA, Region V

B. Okwumabua

S. Diop



## CHEMICAL & ENVIRONMENTAL ENGINEERING, INC.

220 Bagley Avenue • Suite 716 • Detroit, Michigan 48226 • (313) 965-2530

October 24, 1986

Mr. Larry AuBuchon Hazardous Waste Division Michigan Department of Natural Resources 15500 Sheldon Road Northville, Mi 48167

MID 103 481 396

RE: Documentation regarding #2, 5 and 6
Your Letters of May 23 and October 2, 1986:

Dear Mr. AuBuchon:

Please find listed below documentation regarding #2, 5 and 6 of your May 23 and October 2, 1986 letters.

- #2 Four manifests should have had exception reports.
  - a) Manifest #629919

    Generator 2<sup>nd</sup> copy is provided (was misplaced)
  - b) Manifest #629918
    Generator 2<sup>nd</sup> copy is provided (was misplaced)
  - c) Manifest #629913

Petrochem mailed the Generator 2<sup>nd</sup> copy but was not received by Action Tank Wash Inc. It was lost in the mail. Copy of a signed TSDF is provided as proof that the Waste was properly disposed of according to RCRA rules and regulations.

d) Manifest #503294

Load was rejected by Marine Pollution Control. It was returned to Action Tank Wash and was discharged in the 12,000 gallon pit and processed through the Wastewater Treatment facility.

Mr. Larry AuBuchon Hazardous Waste Division Michigan Department of Natural Resources 15500 Sheldon Road Northville, MI 48167

#5 & 6 Proper documentation must be received indicating proper removal of the 55 gallon containers.....

All the containers were disposed of at Petrochem Processing Inc. (Manifest #0773913 (copy attached.)

#8 There were two areas where spillage was noted....

The spill was cleaned and the contaminated material was hauled to Chem-Met Services Inc. by Inland Water Pollution Control. (Manifest #0773914 (copy attached.)

If you have any questions regarding this matter please feel free to contact me at (313) 965-2530.

Sincerely yours

Seydou Diop

Encls.

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# MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA. 1969.

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ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE

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### DO NOT WRITE IN THIS SPACE

1979, as amended and Act 136, P.A. 1989.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, PA. 1969.

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Failure to file is punishable under section 299.548 MCL or Section 10 o Apr 136, P.A. 1963.

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# MICHIGAN DEPARTA NT OF NATURAL RESOUNCES

DO NOT WRITE IN IS SPACE

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MICHIGAN AT 1-500-292-4709 OR OUT OF STATE AT 517-372-7669 AND THE NATIONAL RESPOY

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## MPG MARINE POLLUTION CONTROL

8631 WEST JEFFERSON . DETROIT, MICHIGAN 48209 . 313/849-2333 . TELEX 23-0387

#### INVOICE

Action Tank Wash 130 S. Green St. Detroit, Michigan 48209 February 22, 1985
Invoice # 7329

For services to pump and dispose of material from waste pit at your facility. NOTE: Load to Wayne Disposal was rejected and returned to your facility.

#### 2/19/85

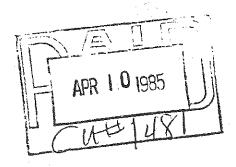
Tractor/Vacumm Trailer Equipment Operator Laborer	8 hrs 8 hrs 2 hrs	@ 66.50 = @ 26.10 = @ 22.55 =	532.00 208.80 45.10
Suction Hose	100'	@ 25.50/ per 100'=	25.50
Air Respirator	1	@ 85.00 =	<u>85,00</u>

TOTAL DUE

\$896.40

TERMS: NET 15 DAYS

A service charge of 1.5% per month will be added to all invoices past due. (18% annually)







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# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

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Common management of the contract of the contr	15. 16.	Special H GENERATOR proper shipp according to Unless I am of RCRA I a	andling In  R'S CERTIFIC ing name an applicable ir a small quan	structions ATION: I her d are classifin nternational a	and Add eby declare ed, packed, ind national	that the commarked, and is government to render	ontents and labe ant regu	of this led, and lations, statute	or regulat	respects in	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation	ınder	b/c/d/	ion
Common management of the contract of the contr	16.	Special H GENERATOR proper shipp according to Unless I am of RCRA I a	andling In  R'S CERTIFIC ing name an applicable in a small quan iso certify th we selected the	structions  ATION: I her d are classifinternational a	and Add eby declare ed, packed, ind national	that the commarked, and is government to render	ontents and labe ant regu	of this led, and lations, statute	or regulat	respects in	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation	ınder	b/c/d/	ion
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- Carros research and a second	16. (	Special H GENERATOR proper shipp according to Unless I am of RCRA, I a ble and I ha environment  Printed/Ty HATIL	andling In  TS CERTIFIC ing name an applicable in a small quan lso certify th re selected to	structions  ATION: I her d are classifin nternational a titity generato at I have a pr he method o	and Add eby declare ed, packed, and nationa if who has if ogram in pi	that the commarked, and i governme exemilace to reduce to storage o	nforma contents and labe ent regu pted by uce the or dispos	of this led, and lations, statute volume sal curre	or regulat and toxici ently availa	respects in tion from th ity of waste able to me	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation to be eleat to h	under cono uma <i>Mor</i>	b/ c/ d/	ion ly p lith
- Carros research and a second	16.	Special H  GENERATOR proper shipp according to  Unless I am of RCRA, I a ble and I have environment  Printed/Ty  MATIL  Transporte	andling In  PS CERTIFIC ing name and applicable in a small quantiso certify the ve selected the ped Name DA WARE I Acknowled	structions  ATION: I her dare classifinternational attity generato at I have a prhe method of the me	and Add eby declare ed, packed, and nationa if who has if ogram in pi	that the commarked, and i governme exemilace to reduce to storage o	nforma contents and labe ent regu pted by uce the or dispos	of this led, and lations, statute volume sal curre	or regulate and toxiciently available.	respects in tion from th ity of waste able to me	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation s to be event to h	under conoi umai	Sectimical near Fig. 16	ion ly p lith Day
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	16. (	Special H GENERATOR proper shipp according to Unless I am of RCRA, I a ble and I have environment Printed/Ty HATIL Transporte Printed/Ty	andling In RS CERTIFIC ing name an applicable in a small quan lso certify the selected ti  ped Name DA NARI IT I Acknoped Name	structions  ATION: I her dare classifinternational at the dare aprile method of the me	and Add eby declare ed, packed, and nationa r who has logram in pi f treatment	e that the commarked, and government of the commarked, and government of the commarked of t	ontents and labe ant regu pted by uce the or dispos	of this led, and lations. statute volume sal curre	or regulate and toxiciently available.	respects in tion from th ity of waste able to me	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation s to be event to h	under conocumac Mor	Section in the sectio	ion ly p lith Dat Dat
	16.	Special H  GENERATOR  proper shipp according to  Unless I am of RCRA, I a ble and I ha environment  Printed/Ty  HATIL  Transporte  Printed/Ty	andling In RS CERTIFIC ing name an applicable in a small quan lso certify the selected ti  ped Name DA NARI IT I Acknoped Name	structions  ATION: I herd are classifinternational at the aprilement of the method of	and Add eby declare ed, packed, and nationa r who has logram in pi f treatment	e that the commarked, and government of the commarked, and government of the commarked of t	ontents and labe ant regu pted by uce the or dispos	of this led, and lations. statute volume sal curre	or regulate and toxiciently available.	respects in tion from the ity of waste able to me	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation at to be eat to h	Mor O	Sect Mical In the Sect of Sec	ion lith Dati Dati Dati
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	15.	GENERATOR proper shipp according to Unless I am of RCRA, I a ble and I have environment  Printed/Ty HATIL Transporte Printed/Ty Transporte	andling In  A'S CERTIFIC ing name an applicable in a small quan iso certify th we selected the ped Name DA NARI in 1 Ackno in 2 Ackno	structions  ATION: I her d are classificatemational a atility generato at I have a pr he method or  owledgeme	and Add eby declare ed, packed, and nationa r who has logram in pi f treatment	e that the commarked, and government of the commarked, and government of the commarked of t	ontents and labe ant regu pted by uce the or dispos	of this led, and lations. statute volume sal curre	or regulat and toxici and toxici antly avail:	respects in tion from the ity of waste able to me	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation at to be eat to h	Mor O	Sect Mical In the Sect of Sec	ion ly p hith Dat Dat Dat
	15.	GENERATOR proper shipp according to Unless I am of RCRA, I a ble and I have environment  Printed/Ty HATIL Transporte Printed/Ty Transporte	andling In  PS CERTIFIC ing name an applicable ir a small quan iso certify th ye selected th  Pped Name DA NARI or 1 Acknoped Name or 2 Acknoped Name	structions  ATION: I her d are classificatemational a atility generato at I have a pr he method or  owledgeme	and Add eby declare ed, packed, and nationa r who has logram in pi f treatment	e that the commarked, and government of the commarked, and government of the commarked of t	ontents and labe ant regu pted by uce the or dispos	of this led, and lations. statute volume sal curre	or regulat and toxici and toxici antly avail:	respects in tion from the ity of waste able to me	proper of	make	iy de	Li:	ed abortsport	ve by by high	nway	cation at to be eat to h	Mor O	Sect Mical In the Sect of Sec	ion ly p hith Dat Dat Dat
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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARLENE J. FLUHARTY STEPHEN V. MONSMA TEWART MYERS JID D OLSON RAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

Gordon E. Guyer, Director S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

September 16, 1986

CERTIFIED MAIL Mr. Dean Perakis, Owner Action Tank Wash, Inc. 130 S. Green Detroit, MI 48209

RE: MID 103481396

Dear Mr. Perakis:

On May 20, 1986, an inspection was conducted at your facility located at 130 S. Green, Detroit, MI. The inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

A letter was sent to you on May 23, 1986, noting violations under RCRA and the State of Michigan, Hazardous Waste Management Act, Act 64, P.A. 1979, as amended. No response has been received by this office.

You are requested to respond to these violations within  $15\ \mathrm{days}$  from the date of this letter, or I will be forced to escalate enforcement action which may include a financial penalty.

If you have any question, please contact me at 313-459-9180.

Sincerely,

Larry AuBuchon

Hazardous Waste Division

LA/bs

cc: U.S. EPA Region V

B. Okwumabua

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STATE OF MICHIGAN

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#### **DEPARTMENT OF NATURAL RESOURCES**

XHOM KWOXXXXXXXX THEKIKX

Gordon E. Guyer, Director S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

May 23, 1986

Mr. Dean Perakis, Owner Action Tank Wash, Inc. 130 S. Green Detroit, MI 48209

RE: MID 103481396

Dear Mr. Perakis:

On May 20, 1986, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 130 S. Green, Detroit, Michigan. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

- 1. As a comment, the DOT shipping name, class and identification number should be reviewed. Suggestions on the proper information is contained within the report.
- 2. Four manifests should have had exception reports filed because there was no documented receipt of those loads at the disposal facility. This is required as specified in 40 CFR 262.42.
- As a comment, shipping containers must be DOT approved for handling the waste material.
- 4. All containers except one were not marked with the start accumulation dates and the words "Hazardous Wastes" as is required in 40 CFR 262.34. The sludge cart must also be labeled.

Page 2 Mr. Dean Perakis Action Tank Wash Detroit, MI 48209 MID 103481396

- 5. At least five 55 gallon containers had hazardous waste which were not properly closed as is required in 40 CFR 265.173.
- 6. Six 55 gallon containers had ignitable hazardous wastes which were not stored 50 feet from the property line as is required in 40 CFR 265.176.
- 7. Personnel training records were not prepared as is required in 40 CFR 265.16.
- 8. There were two areas where spillage was noted and not properly removed as is required in 40 CFR 265.31.
- 9. A contingency plan and emergency procedures was not prepared as is required in 40 CFR Subpart D.
- 10. The State of Michigan, Hazardous Waste Management Act, Act 64 P.A. 1979 as amended, requires a generator to construct and maintain containment in accordance with 40 CFR 264.175. A schedule must be established for construction of this containment to bring this facility into compliance with this requirement. The proposed schedule and engineering plans must be submitted for review.

Please respond and provide documentation on any actions you have taken to correct these violations by June 23, 1986. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

Larry auBuchon

Hazardous Waste Division

LA/aw

cc: U.S. EPA, Region V

B. Okwumabua

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### RCRA INSPECTION REPORT

EPA Identification Number: 👠	ID 10348	11396
Installation Name: Ac	Gon Tank Wash, Ir	<u> L</u>
Location Address: <u>13C</u>	S. Green	
City: <u>Detroit</u>	State:	48209
Date of Inspection 52086	Time of Inspection (	from)0900 (to) <u>1040</u>
Person(s) Interviewed Dean Perakis	Title Owner	Telephone (313) 8427380
<del>(************************************</del>		<del></del>
**************************************		
Inspector(s)	Agency/Title	Telephone
Larry Aubucher	MONE-HUD EDA	(313) 159-9180
Linda Copeland - Morgan	MONE-LED ECO	(313) 457-1940
Installation Activity (mark only	y one box)	Inspection Form(s)
Treatment/Storage/Disposal Generation and/or Transpor	per 40 CFR §265.1 and/or tation	Α.
Treatment/Storage/Disposal	(No Generation or Transportate	ion) A
Generation and Transportate	ion	B,C
Generation Only		8
Transportation Only		C

cc: USEPA B. Okunmabua Company Linda Copeland-Margan

### INSPECTION FORM B

<u>Sectio</u>	<u>n A</u> :	Scope of inspection				
Standa	rds	for generators of HAZARDOUS WASTE subject to	40 C	FR 26	2.10	
Sectio	<u>n B:</u>	MANIFEST REQUIREMENTS (Part 262, Subpart B	)			
			Yes	No	NI*	Remarks
(1)	Doe ava	es the generator have copies of the manifest ilable for review? 262.40	X	-00.5 vi-00 VIII-N		
(2)	mon	umine manifests for shipments in past 6 oths. Indicate approximate number of oifested shipments during that period		Chiassitte-sistem≥+		
(3)	fol cop	the manifest forms examined contain the lowing information? (If possible, make 262 ies of, or record information from, manifest to not contain the critical elements)	2.21 s	kilinalli ini madana 1930	delektronomon (************************************	
	à٠	Manifest document number?	X	·		
	b.	Name, mailing address, telephone number, and EPA ID number of generator?	Σ			
	C.	Name and EPA ID number of transporter(s)?	·	) )		
	d.	Name, Address, and EPA ID Number of designa permitted facility and alternate facility?	X	) 		NEED NEED VALUE VA
	e.	The description of the waste(s) (DOT shippi name, DOT hazard class, DOT identification number)?	ng X	(FC) + DOO	03) ( 4g≥	endous Waste Sold NO DRME; NA 9189, whole page (renall)
	f.	The total quantity of waste(s) and the type and number of containers loaded?	X	encount enterprise	SPANS STATES OF	
	g.	Required certification?	<u> </u>	·		
	h.	Required signatures?	X			
(4)	Rep	portable exceptions 262.42				•
	ð•	For manifests examined in (2) (except for s within the last 35 days), enter the number fests for which the generator has NOT receisigned copy from the designated facility widays of the date of shipment.	of ma ved a	ni- I	See '	Remailed
	b.	For manifests indicated in (4a), enter the which the generator has submitted exception (40 CFR 262.42) to the Regional Administrat	repo		)	

(4-82B)

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### Section C - PRE-TRANSPORT REQUIREMENTS (40 CFR Part 262 Subpart C)

				Yes	No	NI	Remarks
	(1)	regulat:	e packaged in accordance with DO ions? (Required prior to movement dous waste off-site) 262.30		X		Landy for shipmed ton
	(2)	accordar hazardou	te packages marked and labeled ince with DOT regulations concernate waste materials? (Required prement of hazardous waste off-site	ing 262.31 ior	and <u>X</u>	262.32	
	(3)	If requi	ired, are placards available to rter? 262.33	demonstration of the state of t	فتحصيح	Sha	estate Provides
¥	(4)	Pre-ship	oment Accumulation:			•	
會	a per	ies only rmit. Th site.	to GENERATORS that store hazard nese items do not apply to gener	ous waste o ators whose	n-sit wast	e is i	90 days or less without mmediately transported
	·	_	hazardous waste accumulated in c ners? If no, skip to b. 262.34	on- <u>/</u>	EAS-MO-SIGN		June Koll old posts
		i.	Is each container clearly marke the date on which the period of accumulation began?		X	w.	one container dated
		<u> </u>	Have more than 90 days elapsed the dates marked?	since		<u></u>	lanour
		íii.	Is each container labeled or ma clearly with the words "Hazardo Wastes?"	us	X	ord Dro	sport Cont > rail of whalele rail labeled ~ 6 combibed ms - 1 labeled ~ 6 combibed
		iv.	Are containers in good condition	n? <u>X</u> *	anandando		ented houser in a
		٧٠	Are containers compatible with in them?	waste <u>X</u>	***************************************		cart of pax
		vi.	Are containers managed to preve leaks?	nt	X		mot pulsed up
		vii.	Are containers stored closed?	42004	工	<del>and an and all</del>	not alosed had bung
		viii.	Are containers inspected weekly leaks and defects?	for	X	densimentiari (ii	
		ix.	Are ignitable and reactive wast at least 15 meters (50 feet) fr facility property line? (Indica waste is ignitable or reactive)	om the te if	X		agulable_
			C-1			ad braced	omers (55 gallows) 001 waste (4-82B) To to company (whalele property fenceline.

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X.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	Exercited April 1	<u>ν</u>	me	incorpotables
ΧÌ٠	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	SiZemenialmuse mu	X -	ł t	( (
If	hazardous waste accumulated in tanks? no, skip to c. 262.34 (January 11, 1982 revision) Is each tank labeled or marked clearly with the words "Hazardous Wastes"?		<u> </u>	and the second second	
ii,	262.34 (January 1982 revision) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	Wilminishuranyano	Windster Winds Add Advanced		
iii.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<sup>©</sup>	Ar a more surger	apportunistud	
iv.	Do continuous feed systems have a waste-feed cutoff?	<b>Win</b>			· ·
٧.	Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	· ·		·	
vi.	Are required daily and weekly inspections done? 265.194		· Calvins	O HARDENALVA, MICH.	
vii.	Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198		-		
viii.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199	ATTERNAL DESIGNAÇÃO	www.comierob	. Alexandrian (SSAR) — Fichillis	

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### Yes No NI Remarks

ix.		the National Fire Protection Association's containing ignitable or reactive wastes?
	Tank capacity:	gallons
	Tank diameter:	feet
	Distance of tank from property line	efeet
	(see tables 2-1 through 2-6 of NFPA Code - 1977" to determine compliance	('s "Flammable and Combustible Liquids ce.)
	hazardous waste accumulated in other n tanks or containers?	
d. Per	sonnel training. 262.34 (a) 5	
	personnel training records lude: 265.16	herafergabraser punish an
i.	Job Titles?	
ii.	Job Descriptions?	·
iii.	Description of training?	
iv.	Records of training?	
٧.	Did personnel receive the required training by 5-19-81?	<u> </u>
۷i.	Do new personnel receive required training within six months?	
vii.	Do personnel training records indic that personnel have taken part in a annual review of initial training?	an 🗼 n
e. Pre	paredness and Prevention 265. Subp	part C
i.	Maintenance and Operation of Facility:	sludge spellage alay
	Is there any evidence of fire, expl release of hazardous waste or hazar waste constituent? 265.31	

No.	·	•	·		
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ii.	If required, does this facility have the following equipment: 265.32						
	Internal communications or alarm systems?	X	emiemento.	**************************************	tolet	hare	
	Telephone or 2-way Radios at the scene of operations?	X	unider collète et le	Ohr-	\$10000 and a second		<b>=</b> 20
	Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X handefindenseets	Selection-to		fue and	tingus	le
	Indicate the volume of water and/or foam	avai	lable	for f	ire con	ntrol:	
Next State Control of the Control of							TO AMERICAN
iii.	Testing and Maintenance of Emergency Equipme	ent:	265.3	3			
	Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	wiferink-na Willia		fuen	loskog	11
	Is emergency equipment maintained in operable condition?			· ·	Jus e	servecie	400 -
ív.	Has owner/operator provided immediate access to internal alarms (if needed)?	X			uma di san da sala a sala a sala a sana	······································	<del>, ,</del>
, V.	Is there adequate aisle space for unobstructed movement?	<u>X</u>	O-CALALITA-Ca-	***************************************	<del>- QCQ</del>		<del></del>
٧i٠	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	•••	*	<b></b>	SPM-64702-www.spm-6470-spm-648	William of the second s	inge-
f. Con	tingency Plan and Emergency Procedures 265	Subpa	irt D				
	Does the contingency plan contain the following information:		M	s bl	a k	repa	مدا
	i. The actions facility personnel must take to comply with §265.51 and 265.56 in resto fires, explosions, or any unplanned to fires, explosions, or any unplanned to fazardous waste? (If the owner has a Prevention, Control and Countermeasures Plan, he needs only to amend that plan incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	spons releas a Spi (SPC) to	e se 11				

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eard to	Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?			
, , ,	Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	<u> </u>	· · · · · · · · · · · · · · · · · · ·	C <sup>OON</sup> G-balafi for variaben no sa su
iV.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	<u> </u>	Particular Salakkini dan bersambah	
٧.	An evacuation plan for facility person nel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	<u> </u>		
vi.	Are copies of the Contingency Plan available at site and local emergency organizations?	<u> </u>	Market and the second	
/ii.	Is the facility emergency coordinator identified?	<u> </u>	· · · · · · · · · · · · · · · · · · ·	ana. November (1984-1985) (Self-Telescons and Telescons and Telescons and Telescons and Telescons and Telescons
iii.	Is coordinator familiar with all aspects of site operation and emergency procedures?	<u> </u>	<u>not il</u>	to thied
ix.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?			
х.	If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?		ao lmla	geney.

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Secti	on D:	R	ECORDKEEPING AND REPORTING (Part 262, Sui	bpart	D)		
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Secti	on E:		NTERNATIONAL SHIPMENTS (Part 262 Subpart 52.50	E)			
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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARLENE J. FLUHARTY CTEPHEN V. MONSMA TEWART MYERS JID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

Gordon E. Guyer, Director S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

October 2, 1986

Mr. Dean Perakis, Owner Action Tank Wash, Inc. 130 S. Green Detriot, MI 48209

RE: MID 103481396

Dear Mr. Perakis.

This letter is to acknowledge receipt of Mr. Seydou Diop's letter dated September 29, 1986 indicating your compliance program for RCRA deficiencies cited during my inspection on May 20, 1986. Items 1, 3, 4 and 10 are considered to have been addressed at this time and I will evaluate the adequacy of your program during future inspections.

The following are still existing violations:

- 1. (2) Four manifests should have had exception reports filed because there was no documented receipt of those loads at the disposal facility. This is required as specified in 40 CFR 262.42.
- 2. (5 & 6) Documentation must be received indicating proper removal of the 55 gallon containers on site at the time of inspection and from subsequent generation activity.
- 3. (7) Personnel training records were not prepared as is required in 40 CFR 265.16.
- 4. (8) There were two areas where spillage was noted and not properly removed as is required in 40 CFR 265.31. Documentation of the clean up and waste removal is necessary.
- 5. (9) A contingency plan and emergency procedures was not prepared as is required in 40 CFR Subpart D.

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Page 2, 10-2-86 Action Tank Wash Detroit, MI RE: MID 103481396

Mr. Diop indicated the training program, contingency plan and emergency procedure and reporting system will be submitted by November 15, 1986. This is unacceptable because of the delay's already incurred in resolving these violations. Resolution and documentation of the actions taken to correct all five remaining violations is required by October 27, 1986.

If you have any questions regarding this matter, please contact me at 313-459-9180.

Sincerely,

Larry AuBuchon Hazardous Waste Division

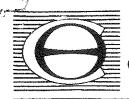
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cc: U.S. EPA, Region V

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### CHEMICAL & ENVIRONMENTAL ENGINEERING, INC.

220 Bagley Avenue • Suite 716 • Detroit, Michigan 48226 • (313) 965-2530

September 29, 1986

HAND DELIVERED
Mr. Larry AuBuchon
Michigan Department of Natural Resources
Hazardous Waste Division
S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

RE: Your letter of May 23, 1986 regarding Action Tank Inc. 130 S. Green Detroit, MI 48209, MID 103481396

Dear Mr. AuBuchon:

In response to your letter of May 23, 1986. Action Tank Inc. proposes to be in compliance with the following RCRA Rules and Regulations by November 15, 1986.

- 1. Establish a written training program for those employees involved in the handling of hazardous waste as required by 40 CFR 265.16.
- 2. Develop a contingency plan and emergency procedure as required by 40 CFR Subpart D.
- 3. Establish a record keeping reporting system as required by 40 CFR 262.40, 262.41 and 262.42.

The use of containers for the short term storage of hazardous waste has been discontinued at Action Tank Wash Inc. Your comments #4, 5, 6, and 10 regarding containers are therefore not applicable under the present condition.

At present the wash water is treated through an elaborate treatment system: The "clean water" is discharged into the sewer system and the sludge portion is collected at the vacuum filter into a sludge car for transfer into a large sludge bin. After a load is obtained, the bin with the sludge is transported to the disposal facility. The starting date of sludge accumulation and the word "Hazardous Waste" will be marked on the side of the bin and the sludge car. Since your inspection in May 1986, special care has been taken in completing the manifests to include the following information:

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- a. Manifest document number.
- b. Name, mailing address, telephone number, and EPA ID number of generator.
- c. Name and EPA ID number of transporter(s).
- d. Name, Address, and EPA ID number of designated permitted facility and alternate facility.
- e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number).
- f. The total quantity of waste(s) and the type and number of containers loaded.
- g. Required certification.
- h. Required signatures.

A copy of the training program, contingency plan and record keeping system will be provided to the Southeast field office of MDNR by November 15, 1986.

If you have any questions regarding this matter, please feel free to contact me at 965-2530.

Sincerely yours,

Seydou Diop, P.E.

SD/aoo

SEP 0 0 1986

HAZARDOUS WASTE DIV.

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OCT 28 1986

HAZARDOUS WASTE DIV

CONTINGENCY PLAN

FOR

ACTION TANK WASH INC.

130 S. GREEN

DETROIT, MI 48209

## CHEMICAL & ENVIRONMENTAL ENGINEERING, INC.

220 Bagley Avenue • Suite 716 • Detroit, Michigan 48226 • (313) 965-2530

CONTINGENCY PLAN

FOR

ACTION TANK WASH INC.

130 S. GREEN

DETROIT, MI 48209

### FIGURE

### DAILY OPERATING LOG

# ACTION TANK WASH INC. 130 S. GREEN DETROIT, MICHIGAN 48209

DATE	WASTE	QUANTITY	DESCRIPTION OF WASTE	TRANSPORTER & ID	TSDF & ID	MANIFEST #	DATE OF RECEIPT OF GENER. 2ND COPY
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FIGURE

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						ABRASION	PIPES
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						COMMENTS	

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### I. GENERAL INFORMATION

### a) Location, Operation and site plan

This contingency Plan is written for the Action Tank Wash, facility located at:

130 S. Green

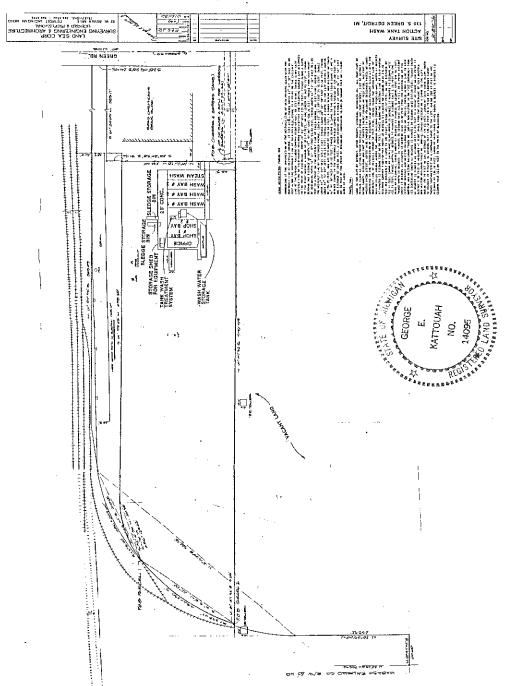
### Detroit, MI 48209

The attached site layout figure (1) shows the property boundary, adjacent street railroad right of way truck Wash Bays, waste water treatment facility, material and safety equipment storage bays, hazardous sludge storage bin and on site buildings.

### b) Description of Facility operation

This is a hazardous waste generating facility. It washes tankers used to haul industrial solvents, paint resins, phosphoric and sulfuric acids, soy bean oil, latex, plasticiser, caustic and motor The tanker arriving at the facility will always contain residues of the above mentioned compounds. Tankers are washed in Wash Bay #1 #2 and #3. The washwater containing residues of industrial solvents, acids, paint resins and others is discharged into a 12000 gallon concentrate pit via concrete benches on the floor of the Wash Bays. From the pit wastewater is processed through the wastewater treatment facility. The sludge portion is stored in the sludge storage bin for landfill disposal. the "clean" water from the treatment system is discharged into the sewer system. Several analytical tests showed that it meets the city of Detroit sewer discharge requirements in heavy metals, cyanide and other pollutants.

A floor plan of the facility showing the areas described above is given in, figure 2 and listed in Table 1.



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## JI. EMERGENCY COORDINATORS 40 CFR 264, 52 (a), 264,56 (d)

If an emergency develops at the facility, the discoverer should contact the emergency Coordinator listed in Table 2. Dean Perakis, primary Emergency Coordinator should be contacted first. If he is not available the others should be called in the order listed in Table 2 until someone is reached. The primary coordinator and alternates have complete authority to commit all resources of the company in the event of an emergency. Table 3 lists the organizations that could possibly be contacted by the Emergency Coordinator in the event of an emergency.

### TABLE 1

# AREAS OF PLANT RELATED TO HAZARDOUS WASTE ACTIVITIES.

AREA

ACTIVITIES

WASH BAY #1

TANKER WASH AREAS

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Generate liquid hazardous wastes.

#3

12,000 Gallon wastewater

Liquid hazardous wastes in Wash

Holding pit

Bay #1 #2 and #3 is stored in the

pit before pretreatment.

WASTEWATER TREATMENT SYSTEM

The liquid hazardous wastes stored in the concrete pit is

processed through the waste water

treatment system. The "clean"

water is discharged into the sewer

system and the hazardous sludge is

disposed of in a landfill.

SLUDGE STORAGE BIN SHORT TERM STORAGE of hazardous

waste sludge before landfill dis-

posal.

SHOP BAY

" #2

" #3

Storage area for virgin chemicals

such as sulfuric acid, caustic,

Aluminum sulfate surfactant and

polymer for slocculation. Also

storage area for safety equipment.

### TABLE 2

### EMERGENCY COORDINATORS LIST

Name & home address Work/Home Available on-site

PRIMARY

(313)842-7380/420-0073. Mon-Sat 8:00am - 5:00pm

Dean Perakis

42696 Steeple View

Northville, MI 48167

ALTERNATES

Jose E. Flores (313)842-7380/841-7418 Mon-Fri 4:00pm - 12:30am

1242 Casgrain

Detroit, MI 48209

Timothy Tucker (313)842-7380/383-3861 Mon-Sat 12.00am - 8:30am

1566 Lincoln

Lincoln Park, MI 48146

# TABLE 3 EMERGENCY CONTACTS

EMERGENCY	ORGANIZATION/AGENCY	EMERGENCY NO.
Injury	Southwest Detroit Hospital	496-7700
	Detroit Receiving Hospital	745-3374
	Taylor Ambulance Service	292-7920
		576-1414
Fire/explosion	Detroit Fire Department	911
Hazardous material	Mich. Dept. of Natural	
spill or release	Resources-Spill Response Ctr.	1-800-292-4706
	MDNR-Local Office: Northville	459-9180
	Detroit Water & Sewage Dept.	
	System Control	227-4775
	Industrial Waste Control	935-4491
	U.S. EPA-National Response	1-800-293-4706
	Center	
	Wayne County Air Pollution	
	Control	
	Business hours	224-4650
	Evening hours	224-4661
Natural disaster	Detroit Police Dept.	911
	Wayne County Sheriff	224-222
	Army Corp of Engineers	226-6413

### TII IMPLEMENTATION OF the CONTINGENCY PLAN

The decision to implement the contingency plan depends upon whether or not imminent or actual incident could threaten human health or the environment. The SPCC plan will be implemented in the following situations:

### 1. Fire and/or Explosion

- 1.1. A fire causes the release of toxic fumes.
- 1.2. The fire spreads and could possibly ignite materials at other locations onsite or could cause heat-induced explosions.
- 1.3. The fire could possibly spread to offsite areas.
- 1.4. Use of water or water and chemical fire suppressant could result in contaminated runoff.
- 1.5. An imminent danger exists that an explosion could ignite other material stored at the facility
- 1.6. An imminent danger exists that an explosion could result in release of toxic material.
- 1.7. An explosion has occurred.

### 2. Spills or Material Release

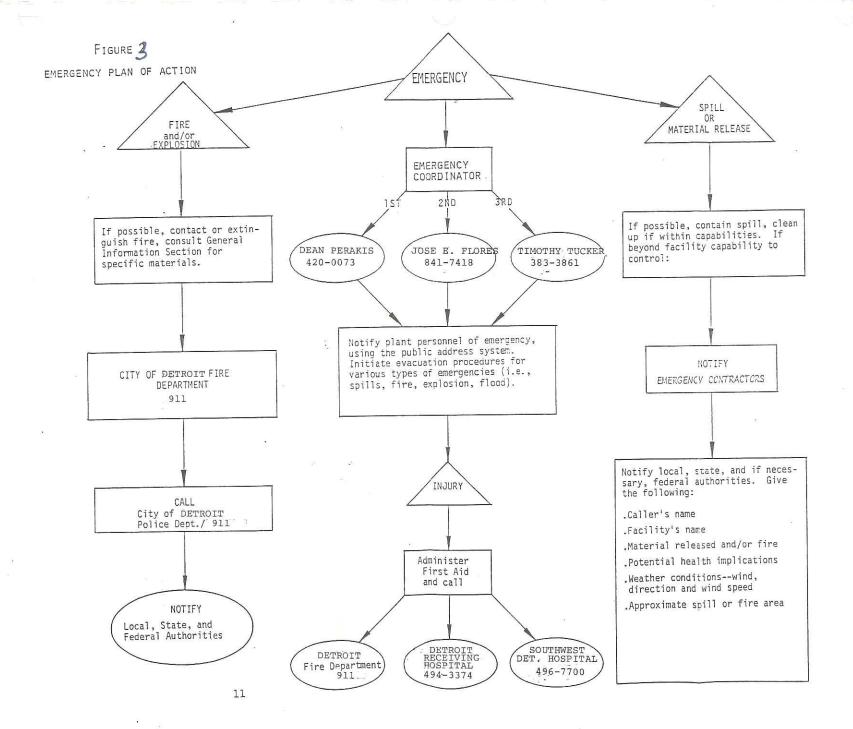
- 2.1. The spill could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- 2.2. The spill could cause the release of toxic liquids or fumes.
- 2.3. The spill cannot be contained onsite, resulting in offsite soil contamination an/or ground or surface water pollution.

Most waste spills and leaks are easily contained within the concrete pit area. Small spills occurring in the treatment areas are covered

with absorbent materials or Diatomacedus Earth. The contaminated material is then loaded into 85-gallon recovery drums for disposal. For large spills or serious leaks the following guidelines will be followed as closely as possible:

- (1) If a major leak develops or a spill occurs from a Wash Bay tank pump, etc., the person discovering the discharge will leave the immediate area and contact the Emergency Coordinator. The Emergency Coordinator will obtain the following information:
  - -- Person(s) injured and seriousness of injury.
  - -- Location of the spill or leak, material involved and source (cleaning solution tank, pump, valve).
  - -- The approximate amount spilled, an estimate of the liquid and the direction the liquid flow or gaseous cloud is moving.
  - -- Whether or not a fire is involved.
- (2) Next, the Emergency Coordinator will:
  - -- Initiate evacuation of the hazard area. For small spills or leaks, isolate at least 50 ft in all directions. For large spills, initially isolate at least 100 ft in all directions and keep all persons upwind of spill.
  - -- Obtain medical attention for any injured persons. It may be helpful to instruct the caller in initial first aid procedures.

    Then call the hospital.



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- -- Call the fire department if a fire is involved that cannot be extinguished by plant personnel.
- -- Dispatch emergency personnel to the site to take the appropriate action.
- -- Contact the proper authorities (Figure 3 and Table 3), if
  the spill or release is large. Contact local authorities first
  so that, if necessary, persons downwind of the vapor can be
  notified and, if necessary, evacuated. If a large spill occurs,
  the initial evacuation area downwind should be 0.2 mile long
  (=1000 ft) by 0.1 ft wide (=500 ft). If a tank containing waste
  becomes involved in a fire, isolate an area 1/2 mile in all
  directions.

### (3) Cleanup personnel will:

- -- Make sure all unnecessary persons are removed from the hazard area.
- -- Put on Protective clothing and equipment.
- -- If a flammable waste is involved, remove all ignition sources and use spark and explosion proof equipment and clothing in containment and cleanup.
- -- If possible try to stop the leak. Special materials will be kept on hand for temporary repairs.

- -- Remove all surrounding materials that could be reactive with materials in the waste. Determine the major components in the waste at the time of the spill.
- -- Use absorbent pads, booms, earth, sand and other inert materials to contain, divert and cleanup a spill if it has not been contained by a dike. Most spills contained within the dike can be pumped back into appropriate tank or recovery drum.
- -- Prevent waste, spilled material from reaching the storm sewer system.

### IV NOTIFICATION (40 CFR 264.56 (a)]

In the event of an emergency situation the Emergency Coordinator will be notified first; and subsequently, all facility personnel; appropriate federal, state or local agencies; and fire or police departments.

### U IDENTIFICATION OF HAZARDOUS WASTES (40 CFR 264.56 (b))

The Emergency Coordinator will immediately identify the character, exact source, amount and area extent of the release. This may require review of facility manifests or chemical analysis.

### VI ASSESSMENT C40 CFR 264.56 (c) and (d)]

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment.

# VII CONTROL PROCEDURES [40 CFR 264.52 (a)]

(1) fire and/or explosions, (2) spills or material release. Natural disasters such as earthquakes or tornados are assumed to fall into one of these two classifications. Another view of emergency plan action is outlined in Figure 4.

### (1) FIRE AND/OR EXPLOSION

The process tank, surface impoundment, sludge conditioning tank and wastewater treatment areas can be easily accessed by firefighting and other emergency vehicles and equipment. Roads and aisles leading to these areas will be kept clear at all times. During fire emergencies, company personnel trained in fire fighting and prevention will take the following actions until the arrival of the CITY OF INKSTER FIRE DEPARTMENT.

- -- Hazardous waste processing in all areas will be shut down immediately.
- -- All feed lines and additional equipment (pumps, compressor valves) will be shut down as necessary and practical.
- -- The emergency coordinator will be contacted. (see Table 2)
- -- The area affected will be cleared of all personnel not actively involved in fire fighting. These persons are to report to rally point 1 or 2 for accountability. Rally points are designated in

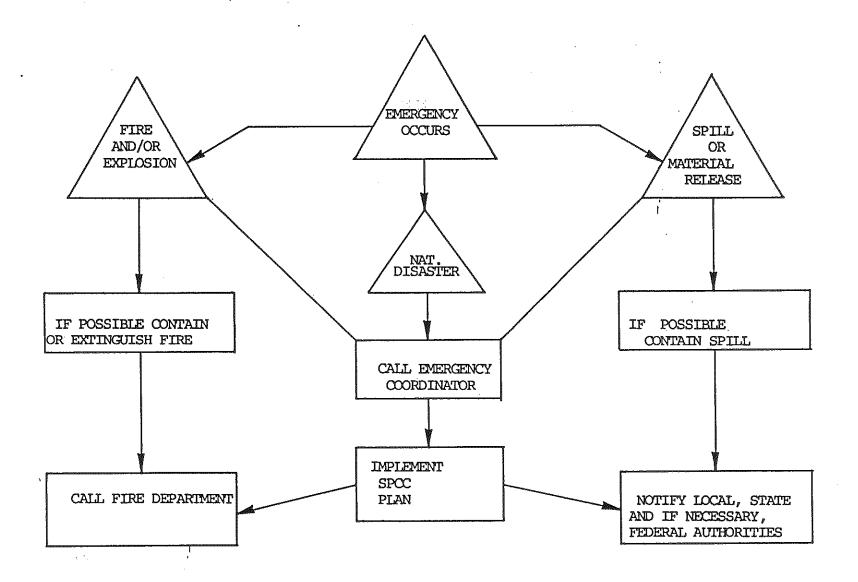


Figure 4 Overview of emergency plan of action.

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Figure 5. All persons in Section 1 on Figure 5 proceed to rally point 1, those in Section 2 to rally point 2.

-- All injured persons will be removed and first aid administered (depending on the extent of the injury) before the arrival of the ambulance to take them to

In case of a spill of flammable materials, all vehicular traffic will be halted and hazardous waste processing will be stopped. The fire fighting personnel at Action Tank Wash will cover the spill area with enough dirt and sand to prevent sudden ignition of the spill. If a highly flammable material such as waste gasoline and waste solvent is released, all persons within a quarter mile radius of the release will be notified.

All ignition sources within this area will be eliminated. Use of motor vehicles within this area will be eliminated or restricted to avoid ignition of the vapor which can cause a flashback to the source and an initial explosion of fire of wide dimensions. If the chances of an impending explosion are high, the entire area within a 2000-ft radius of the source will be evacuated. If a fire is involved and is concentrated at the source, people will be evacuated up to a half-mile downwind. Fire fighting will not be done at the risk of injury to the persons involved; however, early containment of fires can significantly decrease total damage. Notification procedures are given in Figure 3. The office receptionist will be called only if it is absolutely necessary so that she remains free to handle outside emergency calls. Area or plant evacuation will be necessary incase

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# (2) SPILLS OR MATERIAL RELEASE

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some reason a chemical spill is not contained within the sump area. an area of isolation will be established around the spill. The size of the area will generally depend on the size of the spill and the materials involved. If the spill is large and involves a tanker rupture, an initial isolation of at least 20-ft in all directions will be used. Small spills or leaks from one of the tankers will evacuation because it will be contained inside the concrete pit. This will allow cleanup and repair and prevent When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible, the area will be roped or If the spill results in the formation of a otherwise blocked off. toxic vapor cloud, the City of Detroit Police and Fire Department will be called upon and the evacuation of the plant will be enforced. Whether or not the control and cleanup of a spill release, or fire is within the capabilities of Action Tank Wash Inc. Personnel, Michigan Department of Natural Resources and EPA Regional Administrator will be notified. (See Figure 4)

# VIII <u>PREVENTION OF RECURRENCE OR SPREAD OF FIRES. EXPLOSIONS OR RELEASES</u> [40 CFR 264.56 (3)]

Actions to prevent the recurrence or spread of fires, explosions or releases include stopping processes and operations, collection and containing released waste and recovering or isolating containers. The onsite training manual addresses the specific actions to be taken in an emergency. In addition, if the facility stops operation in response to an emergency, the Emergency Coordinator will monitor

valves, pipes and other equipment for leaks, pressure build up, gas generation or ruptures.

#### IX STORAGE AND TREATMENT OF RELEASED MATERIAL C40 CFR 264,56 (g)]

Immediately after an emergency, the Emergency Coordinator will make arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, or any other contaminated material.

## X INCOMPATIBLE WASTES (40 CFR 264,56 (h) (1)]

The Emergency Coordinator will ensure that wastes which may be incompatible with the released material are treated, stored or disposed of until cleanup procedures are completed.

### XI POST-EMERGENCY EQUIPMENT MAINTENANCE [40 CFR 264.56 (h) (2)]

After an emergency event, all emergency equipment listed will be cleaned so that it is fit for use or it will be replaced. Before operations are resumed, an inspection on all safety equipment will be conducted as previously discussed. The Regional Administrator, state and local authorities will be notified that post-emergency equipment maintenance has been performed and operations will be resumed.

#### XII TANK SPILLS AND LEAKAGE (40 CFR 264, 194 (c))

In case of tank spill or leakage, the Emergency Coordinator will expeditiously remove all leaked or spilled material from the tank and proceed to clean the area affected. The tank will be put back in service after repair.

### XIII EMERGENCY RESPONSE EQUIPMENT

#### FIRE CONTROL EQUIPMENT

#### a) Portable Fire Extinguishers

Two (2) fire extinguishers are available for immediate use in case of fire. At least one extinguisher is located in each of the following areas:

- Wastewater Treatment Plant
- By the Electrical Box

These fire extinguishers are dry chemical types E and C. Type B is capable of extinguishing fires involving flammable liquids, oils, greases, tars, oil base paints, lacquers and flammable gases; and Type C is capable of extinguishing fires involving energized electrical equipment. All extinguishers comply with National Fire Code Standards for portable fire extinguishers and they are inspected after each use or at least monthly. Records of these inspections are kept in the operating log.

#### b) Spill Clean up Equipment

Equipment for use in containing and cleaning up spilled hazardous waste is stored in the Shop Bays. A list of equipment and materials stored and maintained in the Shop Bays. is listed in Table 4 along with the function of each.

#### c) Personal Protective Equipment

First Aid Kit: one first aid kit is available in the main office.

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Protective clothing and equipment is provided to protect employees during normal and emergency operations. The following protective equipment when not in use is located in the utility van.

- Hard hats
- Protective eyewear
- Steel-toed boots or shoes
- Rubber gloves

Other personal protective equipment is located in the Shop Bays.

- One self-contained breathing apparatus
- Three air supplied full face apparatus
- Two full body safety harnesses

TABLE 4 MATERIALS AND EQUIPMENT FOR SPILL CONTAINMENT AND CLEANUP

MATERIALS/EQUIPMENT	QUANTITY	SUBSTANCES CONTAINED/	LOCAI	ION
Absorbent Pillows	10	for small spills of	Ehop	Bays
		oil solvent and		
		aqueous material		
		except for acids		
		and caustics		
Absorbent booms	100 ft	Oil, solvent, aqueous	Shop	Bays
		material (except acids		
		and caustics)		
3-inch portable	2	Handle oil	Shop	Eays
5 HP gasoline driven				
centrifugal pumps				
3-inch small Portable	7	Handle oil, solvent	Shop	Bays
air driven diaphragm pur	ŋ	acids and caustics		
3-inch small Flexible	≥no e+	Used in pumping acid	Shor	Eane
			ضا لسا السه	naga
Neoprene hoses with quid	SK	oil and most solvent		
couple fittings				

85 gallon Recovery Drums 8

Used to contain con- placed in taminated material strategic except acid and locations

caustic

- Approximately 10 oil absorbent pillows
- Approximately 100-ft absorbent booms (Shop Bays)
- Emergency shower (Waste Treatment Plant)

#### d) Communication Equipment

- A public address system
- 2-way communication between office and plant.

#### XIV COORDINATION AGREEMENTS (40 CFR 264.52 (6), 264.37]

Action Tank Wash Inc. has made the following arrangements to assist in response to emergency situations:

1) An agreement has been made with the following waste hauling contractors:

Great Lakes Environmental Services

22077 Mound Road

P.O. Box 1208

Warren, MI 48091

(313) 758-0400

Inland Waters

24345 King Road

Romulus, Mi 48174

(313) 479-0440

2) Coordinated Emergency Services have been established in

writing with the City of Detroit Police and Fire Department. Detroit Receiving Hospital and Southwest Detroit Hospital. A copy of the Emergency Plan was sent to the following:

Mr Melvin Jefferson

Fire Commissioner

250 Larned

Detroit, MI 48226

Mr William Hart
Police Cheif
1300 Beaubien
Detroit, MI 48226

Mr Edward Thomas

Administrator Detroit

Receiving Hospital

4201 St Antione

Detroit, MI 48207

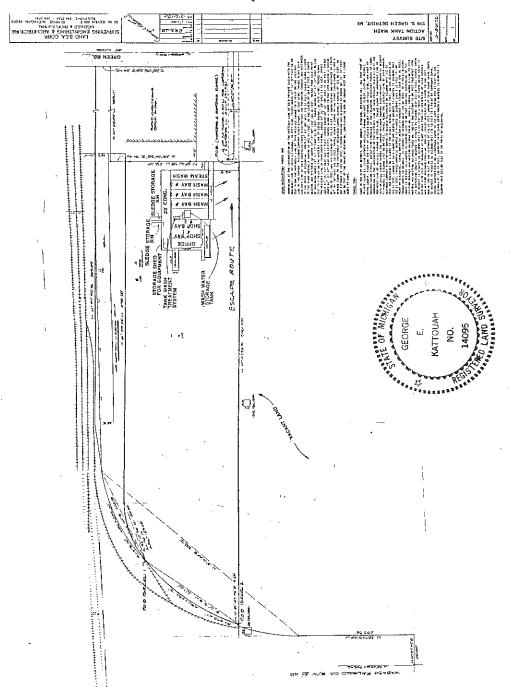
All the above identified groups have received copies of the contingency plan and were invited to visit the facility. Copies of letters addressed to each group and signed receipts of the contingency plan are kept in the plant environmental file.

#### XV EVACUATION PLAN (40 CFR 264.52 (F)]

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow an established set of procedures. Such established procedures will be

followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control. The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. The facility employs a public address system to initiate evacuation of all plant areas. Evacuation is initiated only by an Emergency Coordinator. In the event plant evacuation is called for by the Emergency Coordinator, the following actions will be taken:

- The signal for plant evacuation will be given by the Emergency Coordinator or his alternate so visitors or contractors could leave the site.
- All traffic within the plant will cease to allow safe exit of personnel and movement of emergency equipment.
- <u>All</u> personnel, visitors and contractors will immediately leave through the exit gate.
- No persons shall remain or reenter the location unless specifically authorized by the Emergency Coordinator. Those within the fenced area will normally include fire fighting personnel or emergency teams.
- All persons will be accounted for by the Emergency Coordinator who will designate the safest exit gate for the employees and will also choose an alternate exit if the first choice is inaccessible. To assist in this endeavor, the Emergency



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Coordinator will use the Public Address System to call the Plant Personnel to inform them of the nature of the emergency.

- Buring exit, the plant supervisor should try to keep his or her group together. Rally points for specific areas are shown in Figure 5. Immediately upon exit through the gate, the Emergency Coordinator or his alternate will prepare a list of all personnel at the exit gate. All other personnel who have persons reporting to them should report immediately to the front gate for final accounting.
- Upon completion of the employee list, the alternate Emergency Coordinator will hand-carry the list to the Emergency Coordinator. All other personnel will remain at the gate area.
- Cont act personnel should also be listed with the name of their company. Contract foremen should report to the front gate.
- A final tally of persons will be made by the Emergency Coordinator.
- No attempt to find persons not accounted for will involve endangering lives of others by reentry into emergency areas
- Reentry into the fenced area will be made only after clearance is given by the Emergency Coordinator. At his direction, a signal or other notification will be given for reentry into the plant

# EMERGENCY NOTIFICATION FORM

DATE

PLANT:
PERSON REPORTING:
TIME OF CALL:
PERSON CONTACTED:
(NAME)
(TITLE)
(AGENCY)
TELEPHONE NUMBER CALLED:
TIME AND DURATION
PLACE
MATERIALS: WITH
QUANTITIES
RELEASED TO
(e.g. land, stream, air, groundwater)
CIRCUMSTANCES
(e.g. spill, process upset, equipment failure, emission)
CONTAINMENT/REMOVAL EFFORTS (e.g., emergency dike, boom, etc.)
20000000000 A 2 25 7777 T T A 2777
EXTENT OF INJURIES, IF ANY
OTHER DETAILS, AS APPLICABLE If need, use reverse side also.

- In all questions of accountability, immediate supervisors will be held responsible for those persons reporting to them.
  Visitors will be the responsibility of those employees they are seeing. Contractors are the responsibility of those persons administering the individual contracts.
- Drills are held to practice all of these procedures and are treated with the same seriousness as an actual emergency.

#### XVI REQUIRED REPORTS

As required by 264.56 (j), any emergency event (e.g., fire, explosion, etc.) that requires implementing the contingency plan will be reported in writing within 15 days to the EPA Regional Administrator. A reporting form for emergency events is shown in Figure 6. In addition to these reporting requirements for State and Federal authorities. Action Tank Wash also has internal reporting requirements. The following incidents require that an incident report be completed and returned to the Plant Manager within 5 working days and made a part of the operating record:

- All fires.
- Unusual gas or vapor releases.
- Chemical spills of more than 10 gallons (or smaller volumes if highly toxic materials are involved).
- All injuries except minor cut and bruised (all burns and chemical irritations).
- All equipment damage due to malfunction or operating error.

- All "near misses" of the above variety that could have had serious consequences.

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OCT 28 1986

HAZARDOUS WASTE DIV.

RCRA TRAINING PROGRAM

FOR

ACTION TANK WASH INC.

130 S. GREEN

DETROIT, MI 48209

# CHEMICAL & ENVIRONMENTAL ENGINEERING, INC.

220 Bagley Avenue • Suite 716 • Detroit, Michigan 48226 • (313) 965-2530

RCRA TRAINING PROGRAM

FOR

ACTION TANK WASH INC.

130 S. GREEN

DETROIT, MI 48209

## RCRA

PERSONNEL TRAINING

(40 CFR 264.16)

AT

ACTION TANK WASH INC.

130 S. GREEN

DETROIT, MI 48209

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# I. PERSONNEL TRAINING [40 CFR 264. 16(a) (1)]

The information contained in this section outlines the personnel training program for Action Tank Wash Generating Facility as required by 40 CFR 264. 16 (a) (1).

# II. <u>OUTLINE OF TRAINING PROGRAM [40 CFR 264. 16(a) (1) and (2)]</u> Job Titles and Job Descriptions [40 CFR 264.16 (d) (1) and (2)]

Figure 1 shows the organization of personnel at the facility.

6 employee positions are directly involved with the handling of waste: The President, the Plant Supervisor, the Maintenance Supervisor and the Office Manager.

President Dean Perakis

\* General Manager

Plant Supervisor Jose E. Flores

Maintenance Supervisor Timothy Tucker

> Office Manager Matilda Ware

Forman/Operators Librado Rocha Donnie Shackelford

Figure 1 Organization chart for Action Tank Wash Hazardous Waste Generating Facility.

\*is not part of Hazardous Waste Management personnel.

TABLE 1
HAZARDOUS WASTE MANAGEMENT/HANDLING PERSONNEL

POSITION	NAME	TITLE
Emergency Coordinator	Dean Perakis	President
Emergency Coordinator Alternate I	Jose F. Flores	Plant Supervisor
Emergency Coordinator Alternate II	Timothy Tucker	Maint. Supervisor
Environmental Record Keeping	Matilda Ware	Office Manager
Specific qualifications	of persons directly invol	ved with Hazardous
Waste Activities.		

<u>Dean Perakis</u>: He is the owner and cofounder of Action Tank Wash. He is a high school graduate and has four years of college. He attended several EPA seminars on RCRA and is completely familiar with the regulations.

Jose F. Flores: He is a high school graduate. He has been working for Action Tank Wash since January 1984. He is the Plant Supervisor.

Timothy Tucker: He is a high school graduate. He has worked in Hazardous Waste Management for one year.

Matilda Ware: She is a high school graduate and has clerical training in Office Management. She has worked for Action Tank Wash Inc. for fifteen years. She will be entrusted with the safe keeping of environmental records.

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#### HAZARDOUS WASTE DUTIES

Position Title: President

Name of employee: Dean Perakis

- Emergency Coordinator for all hazardous waste activities.
- Training of plant personnel in the proper handling of raw materials, intermediates, finished products and waste by-products.
- Responsible for all air. water and solid waste control systems on the site.
- Obtains all required permits and licenses of modifications of same from local, state and federal regulatory bodies.
- Resolves problems involving permits and licenses from local, state
   and federal regulatory bodies.
- Notifies proper authorities in emergency situations.
- Regularly inspects plant grounds and all facilities for status of air, water and solid/hazardous waste emissions and controls.
- Consults with Emergency Coordinator on questions involving emergency action.
- Drafts and submits to General Manager all required reports to EPA or the State.

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Position Title: Plant Supervisor

Name of employee: Jose F. Flores

- Overall operation and maintenance of the hazardous waste storage and disposal facility.
- Maintains facility compliance with RCRA and other permits.
- Oversees operators and reviews their performance.
- Trains operators to:

Operate materials handling equipment safely and effectively Handle leaks, spills and emergency situations.

- Maintains operating log, monitoring records, maintenance records, inspection records, personnel training records and all other required records at the desk of the environmental Record Keeper.
- Notifies Plant Manager and if so directed, proper authorities in emergency situations.
- Schedules all maintenance and repairs to structures and equipment for HWM facility.
- Oversees mechanic/electrician doing both scheduled and unscheduled maintenance and repair work to be sure he is not releasing hazardous wastes to the environment or endangering himself and others.
- Reports to Plant Manager.

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Position Title: Maintenance Supervisor

Name of employee: Timothy Tucker

- Reports to Plant Supervisor.
- Reviews all incoming wastes and assigns wastes to proper storage or processing locations.
- Inspects tanks, pumps, valves and any guages, dials and recorders as required for proper operation and structural integrity.
- Review spill procedures.
- Makes appropriate entries into operating log, monitoring records, inspection records and maintenance records and files them according to established system.
- Notifies Plant Supervisor and other plant authorities as necessary in emergency situations.
- Takes emergency action on <u>own</u> authority in accordance with established procedures.

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Position Titles: Forman and Operators

Name of employees: Librado Rocha and Donnie Shackelford

- Operate waste water facility.
- Report to Plant Supervisor on all hazardous waste movement.
- Perform visual inspection of hazardous waste treatment areas.
- Perform housekeeping activities of various hazardous waste management areas.
- Maintain constant surveillance of any hazardous waste movement of treatment process.
- Report and respond to any clean-up of spills or uncontrolled releases.
- Assist in maintaining facility compliance with RCRA and other waste activities.
- Attend all training classes pertinent to their hazardous waste activities.

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Position Title: Office Manager

Name of Employee: Matilda Ware

- File all the necessary manifests for waste leaving the facility.

- Organizes all environmental records for safe keeping.

- Participate in all training programs for hazardous waste emergencies.

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# III TRAINING CONTENT, FREQUENCY AND TECHNIQUES [40 CFR 264.16 (C) AND (d) (3)]

- a) Introductory and continuing training will be given by the Emergency Coordinator and the plant supervisor. This training will consist of classroom and on the job training. At minimum, the training program must be designed to insure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment and emergency systems including, where applicable:
  - procedure for using, inspecting, repairing and replacing
     facility emergency and monitoring equipment
  - communication or alarm systems
  - response to fires or explosions
  - response to groundwater contamination incidents and slowdown of operations.

Information concerning these topics is found in the Contingency Plan. Signatures of the employees are required on training attendance sheets which serve as documentation of attendance at the training session. These sheets and training records are maintained in the environmental training file. An annual review of the training sessions is required for each employee. In addition to the above session. This session allows for actual hands-on use of a fire

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extingisher on 'pan' fires. Employees are also instructed in the use of the public address system, its function and procedures to be followed if and emergency occurs. (an outline of the training manual seen in Table 2.)

#### b) TRAINING DIRECTOR [40 CFR 264, 16(a) (2)]

The hazardous waste training program is directed by the Emergency Coordinator. He has been trained in all aspects of hazardous waste management (Training Program) and has attended various seminars on the subject. Records of his previous training and his hazardous wast management training are kept in the environmental training file.

#### c) RELEVANCE OF TRAINING TO JOB POSITION [40 CFR 264. 16 (a) (2)]

The President is responsible for teaching hazardous waste management procedures, including emergency response plan implementation, to all waste handling personnel. These people are listed in Table H-1. The overall training program is tiered in some areas to provide training personnel at levels that are relevant to their positions within the For example, people involved directly with the handling of waste are thoroughly trained in all procedures identification and characterization, manifest (hazardous waste system, emergency procedure and inspection) pertaining to these Other employees are presented with more general information areas. such as record keeping, personal safety, etc., (see Figure 2).

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### d) TRAINING FOR EMERGENCY RESPONSE [40 CFR 264.16 (a) (3)]

The training program at Action Tank Wash Inc. is designed to ensure that personnel not only handle hazardous waste in a safe manner but properly respond to emergency situations as well. The program trains hazardous waste handling/management personnel to maintain compliance under both normal operating conditions and emergency conditions. Situations such as unscheduled shutdowns and startups related to storms, power outages, fires, explosions and spills are addressed in Section G-5 on Emergency Response Plan..

### e) IMPLEMENTATION OF TRAINING PROGRAM [40 CFR 264. 16 (b) (d) (4)]

The Director of the Hazardous Waste Training Program (Plant Manager) and all current waste handling personnel have been fully trained at the time of this submittal. In the future, all new personnel will complete this training program within six months of assignment to a position requiring work in the hazardous waste processing area or within six months of their date of employment, whichever is later. No employee hired to work at this facility will work unsupervised prior to completion of the introductory training program. Employees involved with activities at the hazardous waste processing area are required to meet annually for review and update of this training program and to discuss and study the following subjects outlined in Table 3.

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- All hazardous waste currently being handled at the facility, including any changes in waste type, volume, source, characteristics or location.
- 2. The status of processing and operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees participate in developing effective solutions.
- 3. The RCRA requirements for generators of hazardous waste is discussed. Areas where maintenance of compliance is a problem are identified and discussed, and effective solutions are sought.
- 4. Incidents that have occurred in the past year that warrant use of the emergency response plan and/or emergency action. This review focuses on the cause of incident and identification of steps to be taken to prevent or to insure better handling of such events in the future.

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## DOCUMENTATION OF TRAINING AND JOB SPECIFICATION

Records documenting the job title for each position, job descriptions, name of employed and completed training programs (both introductory and review) will be kept On-site in the environmental training file. These records will be kept until closure of the facility for current employees and for three years from the date of the individual employee's termination for former employees.

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Plant								į
Supervisor	В	В	В	В	В	L	В	
Maintenance								
supervisor	В	В	В	В	В	В	L	
Office								
manager	В	В	L	В	L	В	В	

B= Broad instruction

L= limited instruction

Figure 2. Level of training for hazardous waste personnel.

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This personnel training program is designed to teach the Action Tank Wash Waste Management personnel to perform their duties in a way to ensure the facility compliance with the requirements of 264.16.

#### TABLE 2 OUTLINE OF TRAINING PROGRAM

#### 1. Introduction

- 1.1. Chemical hazards and methods of hazardous waste identification.
- 1.2. The Resource Conservation and Recovery Act-RCRA as it applies to Generators, Transporters and TSD\*s
- 2. Job position in relevance to training program
- 3. Facility and Process Description
  - 3.1. Description of wastes to be managed.
  - 3.2. Description of processing facilities.
  - 3.3. Normal/routine operations
  - 3.4. Waste analysis.
  - 3.5. Record keeping and reporting requirements
  - 3.6. Security.
  - 3.7. Inspectors.
- 4. Emergency Procedures and contingency plans
  - 4.1. Emergency Coordinator.
  - 4.2. Emergency procedures.
  - 4.3. Emergency communications/phone numbers.
  - 4.4. Location, maintenance, inspections and use of emergency equipment.

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- 4.5. Procedures for waste feed cutoff systems.
- 4.6. Spill control and response to groundwater contamination incidents.
- 4.7. Fires and explosions.
- 4.8. Power interruption or failure.
- 4.9. Tornados, hurricanes and severe storms.
- 5. Summary of RCRA Regulations for Hazardous Waste Generating Facility.

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General Offices: 212 West Michigan Avenue, Jackson, MI 49201 • (517) 788-0550

March 27, 1991



Mr A Howard, Chief Waste Management Division Michigan Department of Natural Resources Ottawa Building, South PO Box 30028 Lansing, MI 48909

EXCEPTION REPORT SUBMITTED FOR MANIFEST MI 2230928 SHIPMENT

Dear Mr Howard

In the referenced report submitted to you on February 1, 1991, we stated we would provide the results of the investigation conducted to confirm the final disposition of that portion of this hazardous waste shipment which was not accepted at PetroChem. The purpose of this letter is to advise you that we have received the following letters providing written documentation of the ultimate disposal of that portion at Bryson Recovery, Inc.

- 1. A letter to Mr Walter Pociask, K&D Industrial Services, from Mr Steven Mahaffey All Waste, dated February 22, 1991. The All Waste Work Order 709365 and Manifest MI 1269460, along with the Bryson Recovery Services "Certificate of Destruction No 0504" were attached to this letter.
- 2. A letter to Mr E Ceipley, Techna Corporation, from Mr Walter Pociask, K&D Industrial Services, dated March 12, 1991.

Based on the evidence presented in these letters and attachments, we have been advised that the waste was destroyed. Therefore, the requirements for identifying the disposition of a hazardous waste within the exception reporting regulation have been met.

MID 103 481396

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If you have additional information, please call me at (517) 788-1969. Sincerely

Ward Wlean

Ward Wilson Senior Environmental Advisor

CC JLecker, MDNR, Lansing
K&D Industrial Services, Romulus
Regional Administrator, US EPA Region V, Chicago

			,

February 22, 1991

Mr. Walter Pociask
V.P. Environmental Compliance
K & D Industrial Services, Inc.:
6470 Beverly Plaza
Romulus, Michigan 48174

Dear Mr. Pociask:

Believe it or not, I have finally received the Certificate of Destruction that we have discussed. Attached please find a photocopy of the Certificate and the corresponding Uniform Hazardous Waste Manifest for the shipment of Hazardous Waste that was transported from our facility on 1-17-91.

The shipment of Hazardous Waste that moved on 1-17-91 contained (in part) the residual product (220 gallons) that was removed from your tank #VP-12 that was washed out at our facility on 1-2-91 (Work Order #709365). It is my understanding that the residual product removed from your tanker was the basis for your concern/problems with Petro Chem Processing of Detroit. This information was obtained from a photocopy of the Waste Manifest relating to the previous shipment prior to wasing. As you know, we require a copy of the manifest from the last load hauled; prior to any tank cleaning from any Waste Hauling company.

Nonetheless, the attached information should serve as documented proof that the residual product removed from your tank trailer #VP-12 on 1-2-91 was indeed disposed of properly and destroyed in accordance with the procedures used by Bryson Recovery Services of Memphis, TN.

I'm sorry about the delay in obtaining the Certificate of Destruction from Bryson Recovery Services. You will note that the Certificate is dated 2-19-91! Taking this into consideration, it should be painfully obvious that the delay was beyond our control.

I am hopeful that this correspondence and the attached documentation is useful in your effort to deal with your problem. Please let me know if I can help you in any other way.

I remain

Very/Aruly yours,

Steven J Mahaffey

Facility Manager - Detroit (#18)

cc: C. Leppo

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DEADLINE AM. PM.

Work Order No.

709365

Two Ravinia Dr. • Suite 810 • Atlanta, GA 30346 (404) 399-0777

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CENTER AT 1-60-478-800 24 MOURS PER DAY.

EPA Form 8700-22 (Rev. 9/88)

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DO NOT WRITE IN THIS SPACE

1979, as amended and Act 136, FR. 1989.

Falture to file is punishable under section 299,546 MCL or Section 10 of Act 138, P.A. 1989.

DNR 🎉
MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

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K .. D INDUSTRIAL SERVICES, INC.

6470 BEVERLY PLAZA ROMULUS, MICHIGAN 48174 (313) 729-3350

March 12, 1991

Mr. Gene Ciepley Techna Corporation 14808 Helm Street Plymouth, MI 48170

Re: Resolution of Consumers Power-Techna-K & D situation

Dear Gene:

In my letter to you, dated January 31, 1991, I elaborated the basic incident to you, and made assurances that we would forward a copy of the manifest used to transport the removed heel, from our vehicle, to Bryson Recovery Services, for final destruction. It is a part of this letter, as is the certificate of destruction. Also included in this package is a comprehensive truck clean out and wash out procedure, developed as a reaction to this situation, to prevent future occurrences. I am taking the liberty to forward a copy of this correspondence to both Ward Wilson of Consumers Power, and Al Howard of MDNR, so that they all may share in our resolution of this problem, which I consider as complete and comprehensive.

I believe that our employees acted in a manner that was zealous in attempting to eliminate the heel. Unfortunately, they failed to remember that disposal of the entire

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load is the right of the generator, and the acted as though they were cleaning a tanker which was "RCRA empty". Obviously, the quantity of the heel was in excess of "RCRA empty."

As regards the actual final disposition of the residual at Bryson Environmental, the simple fact is that thermal destruction, as done with this material, is arguably the best solution for this waste, and it is obvious that you sent the material to Petro Chem Processing for this exact reason. Be aware that both Petro Chem and Bryson do exactly the same thing with this material.

The frustration with our inability to get Petro Chem to accept the frozen portion of the load is really what exacerbated our problem. I assume that Petro Chem preapproved a representative sample of this waste, with a water fraction in it. When we found the bottom frozen, it was thawed out and returned to Petro Chem, but they still would not accept it. At this point, this is where the material was washed out of the Vacuum Pumper at Allwaste's facility. It is ironic, to me, that it wound up in the same type of facility as Consumers originally specified.

We recognize that the decision was made without Consumers input, and this incorrect action on our part is what was the impetus to develop our wash out policy. K & D does not wish to repeat such an event again, for a simple lack of a phone call. We are also going to be more aggressive in demanding disposal, where that disposal has been preapproved.

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Regarding our invoices #41146 and #41077: K & D feels that we provided, even with the residual problem now resolved, a service, for which payments is due on a "net 30" basis. Therefore, we request your immediate attention to resolving your monetary obligation by payment, or by immediate contact with Bill Davis, our Corporate Controller, and myself, to work out our differences.

Kind Personal Regards,

Walter Pockask,

K & D Industrial Services, Inc.

enclosure: Cert. of Destruction
Manifest #1239460

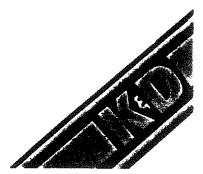
cc: T. Handyside, Executive V.P., K & D

W. Wilson, Consumers Power

D. Perry, Mgr, K & D Midland

A. Howard, MDNR

WP/sar



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